

# *Health and Safety Plan Amendment*

**To:** Tonya Balla  
**From:** Lisa Graczyk **Date:** August 19, 2009  
**Project:** Elgin Salvage PRP OS **WO#** 20405.012.001.0707.00  
**Subject:** Health and Safety Plan Amendment Number 1

This amendment serves to modify the existing Weston Solutions, Inc. (WESTON) Superfund Technical Assessment and Response Team (START) Health and Safety Plan (HASP) dated July 13, 2009 (W.O. No. 20405.012.001.0707.00) for the Elgin Salvage potentially responsible party PRP OS Site (the Site) located in Elgin, Illinois. This HASP amendment applies to all START personnel and their subcontractors (including Dynamac). This amendment addresses activities to take place the week of August 24, 2009, to address drum and cylinder contents at the Site. At the time that the HASP dated July 13, 2009, was written, the contents of drums and cylinders and the removal activities to address the drums and cylinders were unknown.

The following list summarizes the drum and cylinder contents at the site that will be removed the week of August 24, 2009. Note that some of the cylinder contents in the list below are suspected and not known to contain the material listed.

- 9 drums of magnesium turnings
- 9 drums of toxic metals
- 1 drum of fuel-blendable petroleum product
- 3 drums of non-hazardous solids
- 2 drums of non-regulated solids
- 10 drums of flammable aluminum powder
- 2 drums of non-hazardous liquid
- 2 cylinders of chlorine gas
- 2 cylinders of suspected chlorine gas
- 23 cylinders of acetylene
- 2 cylinders of suspected Freon
- 1 cylinder of suspected ammonium gas
- 33 cylinders of propane
- 1 half-ton cylinder of propane
- 9 cylinders of oxygen
- 3 cylinders of suspected flammable material
- 38 fire extinguishers
- 5 cylinders of carbon dioxide
- 8 empty cylinders

For overpacking and neutralizing of flammable solids, the PRP's contractor, Terracon, will be notifying the Elgin Fire Department before commencing work. In addition, the fire department will be notified prior to "flaring off" the half-ton cylinder of propane which is too large to ship. Therefore, the fire department will be on stand-by for these

tasks. In addition, Terracon will have a dump trailer of sand and level D fire extinguishers on-site as a precautionary measure to put out any fires which may occur.

SET, PRP removal subcontractor, will utilize a chlorine monitor during the overpacking and loading of chlorine cylinders. Should there be a chlorine gas release, the site will be evacuated to an upwind location and notifications will be made to the U.S. EPA and local authorities.

In addition, the PRP's contractor will utilize a photoionization detector (PID) to monitor for organic vapors in the breathing zone during site removal activities.

**During the PRP's removal activities, WESTON START will be providing oversight. WESTON START personnel are not expected to be in the breathing zone of removal activities when flammable drum contents are over-packed. These activities will be viewed at a safe distance in Level D Personal Protective Equipment (PPE). WESTON will have a Multi-RAE Plus (outfitted with a PID) on site to monitor their breathing zone area for organic vapors. If organic vapors are sustained at 1 part per million or higher, then WESTON will upgrade to Level C PPE.**

Attached to this Amendment are revised HASP Sections which show the Level C PPE to be worn and the organic vapor air monitoring plan. Also, attached is the approval sign-off sheet which must be signed by Weston personnel and their subcontractors during the PRP's removal activities relating to this amendment.

Reviewed by:		
SO/DSM/CEHS	<u>Tonya Balla</u> Name (Print)	Signature: <u>Tonya Balla</u> Date: <u>8/20/09</u>
Other	<u>Steve Faryan</u> Name (Print)	Signature: <u>Steve Faryan</u> Date: <u>8/25/09</u>
Approved by:		
Project Manager	<u>Lisa Graczyk</u> Name (Print)	Signature: <u>Lisa Graczyk</u> Date: <u>8/21/09</u>
<b>Hazard Assessment and Equipment Selection:</b>		
In accordance with EPA's Personal Protective Equipment Program and 29 CFR 1910.132, at the site prior to personnel beginning work, the SHSC and/or the Site Manager have evaluated conditions and verified that the personal protective equipment selection outlined within this HASP is appropriate for the hazards known or expected to exist. (Refer to Safety Officer Manual Section 1, Personal Protection Program, for guidance.)		
<input checked="" type="checkbox"/> SHSC <input type="checkbox"/> Site Manager    Date: _____		
Name (Print) _____ Signature _____		
<b>Project start date:</b> August 24, 2009 <b>End date:</b> September 2009	This HASP amendment <b>must</b> be reissued/reapproved for any activities conducted after: <b>Date:</b> 12/31/2009	Amendment date(s) By: 1. 2. 3.

DESCRIPTION OF LEVELS OF PROTECTION	
Level C	Level B
<b>Task(s):</b> <input checked="" type="checkbox"/> Head                      Hard Hat <input type="checkbox"/> Eye and Face <input type="checkbox"/> Hearing <input type="checkbox"/> Arms and Legs Only <input checked="" type="checkbox"/> Whole Body                      Saranex <input type="checkbox"/> Apron <input checked="" type="checkbox"/> Hand – Gloves                      Nitrile <input type="checkbox"/> Gloves <input type="checkbox"/> Gloves <input checked="" type="checkbox"/> Foot - Safety Boots <input checked="" type="checkbox"/> Outer Boots                      Tyvek or latex booties <input type="checkbox"/> Boots (Other) <input type="checkbox"/> Half Face <input type="checkbox"/> Cart./Canister <input checked="" type="checkbox"/> Full Face                      APR <input checked="" type="checkbox"/> Cart./Canister                      GMC-P100 <input type="checkbox"/> PAPR <input type="checkbox"/> Cart./Canister <input type="checkbox"/> Type C <input type="checkbox"/> Fall Protection <input type="checkbox"/> Flotation <input type="checkbox"/> Other	<b>Task(s):</b> <input type="checkbox"/> Head <input type="checkbox"/> Eye and Face <input type="checkbox"/> Hearing <input type="checkbox"/> Arms and Legs Only <input type="checkbox"/> Whole Body <input type="checkbox"/> Apron <input type="checkbox"/> Hand - Gloves <input type="checkbox"/> Gloves <input type="checkbox"/> Gloves <input type="checkbox"/> Foot - Safety Boots <input type="checkbox"/> Outer Boots <input type="checkbox"/> Boots (Other) <input type="checkbox"/> SAR - Airline <input type="checkbox"/> SCBA <input type="checkbox"/> Comb. Airline/SCBA <input type="checkbox"/> Cascade System <input type="checkbox"/> Compressor <input type="checkbox"/> Fall Protection <input type="checkbox"/> Flotation <input type="checkbox"/> Other

SITE AIR MONITORING PROGRAM				
Action Levels				
These Action Levels, if not defined by regulation, are some percent (usually 50%) of the applicable PEL/TLV/REL. That number must also be adjusted to account for instrument response factors.				
	Tasks	Action Level		Action
<input type="checkbox"/> Explosive atmosphere		Ambient Air Concentration	Confined Space Concentration	
		<10% LEL	0 to 1% LEL	Work may continue. Consider toxicity potential.
		10 to 25% LEL	1 to 10% LEL	Work may continue. Increase monitoring frequency.
		>25% LEL	>10% LEL	Work must stop. Ventilate area before returning.
<input type="checkbox"/> Oxygen		Ambient Air Concentration	Confined Space Concentration	
		<19.5% O <sub>2</sub>	<19.5% O <sub>2</sub>	Leave area. Re-enter only with self-contained breathing apparatus.
		19.5% to 25% O <sub>2</sub>	19.5% to 23.5% O <sub>2</sub>	Work may continue. Investigate changes from 21%.
		>25% O <sub>2</sub>	>23.5% O <sub>2</sub>	Work must stop. Ventilate area before returning.
<input type="checkbox"/> Radiation		< 3 times background		Continue work.
		3 times background to < 1 mR/hour		Radiation above background levels (normally 0.01-0.02 mR/hr) signifies possible radiation source(s) present. Continue investigation with caution. Perform thorough monitoring. Consult with a Health Physicist.
<input checked="" type="checkbox"/> Organic gases and vapors		> 1 mrem/hour		Potential radiation hazard. Evacuate site. Continue investigation only upon the advice of Health Physicist.
		PRPs will be doing continuous air monitoring activities. > 1 ppm		Upgrade to Level C

